

January 7, 2002

Mr. Scott Christensen  
Koch Fertilizer Storage and Terminal  
One Danuser Drive  
Hermann, MO 65041

Dear Mr. Christensen:

Re: Exempt Construction and Operation Status,  
**017-15103-00042**

The application from Koch Fertilizer Storage and Terminal, received on October 25, 2001, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following proposed changes to the source permitted under Construction Permit 017-8982-00042, located at 7438 East County Road 800 South, in Walton, Indiana 46994, are classified as exempt from air pollution permit requirements:

- (a) the replacement of the flare lighting assembly pilot of ammonia flare F-1 with a more reliable pilot,
- (b) the repair and rebuilding of certain components of the existing vaporizers V-1 through V-8 with like-kind parts, and
- (c) the construction and operation of one (1) ancillary parts washer which utilizes an aqueous solution as the solvent.

The replacement of the pilot lighting assembly of the flare is the replacement of a part of a control device. The replacement will not generate an increase in the capacity of the flare, production throughput, or potential emissions, and is not considered reconstruction because the cost of the parts is less than 50% of the replacement cost of the entire unit. Thus, the proposed replacement is determined to be exempt pursuant to 326 IAC 2-1.1-3(d)(1).

The repair and rebuilding of certain components of the vaporizers is a replacement of specific components of the vaporizers. The proposed repair and rebuilding will not generate an increase in the capacities, production throughputs, or potential emissions of the respective vaporizers, and are not considered reconstruction because the cost of the respective unit parts is less than 50% of the replacement cost of each respective entire unit. Thus, the proposed replacements are determined to be exempt, pursuant to 326 IAC 2-1.1-3(d)(1).

The proposed parts washer generates no regulated air pollutant emissions and is considered ancillary equipment. Thus, the proposed parts washer is determined to be exempt, pursuant to 326 IAC 2-1.1-3(d)(1).

There are no new applicable requirements or changes to the existing conditions of existing permit 017-8982-00042 that are necessary as a result of the proposed projects.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original Signed by Paul Dubenetzky  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

SDF

cc: File - Cass County  
Cass County Health Department  
Air Compliance - Marc Goldman  
Permit Tracking - Janet Mobley  
Technical Support and Modeling - Michele Boner  
Compliance Data Section - Karen Nowak

## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for an Exemption**

#### **Source Background and Description**

<b>Source Name:</b>	Koch Fertilizer Storage and Terminal
<b>Source Location:</b>	7438 East C. R. 800 South, Walton, Indiana 46994
<b>County:</b>	Cass
<b>SIC Code:</b>	4226
<b>Operation Permit No.:</b>	CP 017-8982-00042
<b>Operation Permit Issuance Date:</b>	January 5, 1998
<b>Exemption No.:</b>	017-15103-00042
<b>Permit Reviewer:</b>	SDF

The Office of Air Quality (OAQ) has reviewed an exemption application from Koch Fertilizer Storage and Terminal relating to the operation of their proposed repairs and/or replacements.

#### **Explanation of Exemption**

On October 25, 2001, Koch fertilizer Storage and Terminal submitted an application for approval to perform the following proposed actions:

- (a) The replacement of the flare lighting assembly pilot of ammonia flare F-1 with a more reliable pilot.
- (b) The repair and rebuilding of certain components of the existing vaporizers V-1 through V-8 with like-kind parts.
- (c) The construction and operation of one (1) ancillary parts washer which utilizes an aqueous solution as the solvent.

The replacement of the pilot lighting assembly of the flare is the replacement of a part of a control device. The replacement will not generate an increase in the capacity of the flare, production throughput, or potential emissions, and is not considered reconstruction because the cost of the parts is less than 50% of the replacement cost of the entire unit. Thus, the proposed replacement is determined to be exempt pursuant to 326 IAC 2-1.1-3(d)(1).

The repair and rebuilding of certain components of the vaporizers is a replacement of specific components of the vaporizers. The proposed repair and rebuilding will not generate an increase in the capacities, production throughputs, or potential emissions of the respective vaporizers, and are not considered reconstruction because the cost of the respective unit parts is less than 50% of the replacement cost of each respective entire unit. Thus, the proposed replacements are determined to be exempt, pursuant to 326 IAC 2-1.1-3(d)(1).

The solvent of the proposed parts washer contains no volatile organic compounds (VOC) or hazardous air pollutants (HAP). Thus, the proposed parts washer is determined to be exempt, pursuant to 326 IAC 2-1.1-3(d)(1).

All actions proposed under this request will not generate an increase in potential emissions of any pollutant, increase the respective capacities of the affected units, allow an increase in throughput at the source, or trigger any new applicable rules.

## **Existing Approvals**

The source was issued CP 017-8982-00042 on January 5, 1998. The source has been operating under this permit and an amendment to the construction permit (017-14222-00042), issued on June 1, 2001.

## **Justification for the Modification**

The proposed actions are being approved via an exemption, pursuant to 326 IAC 2-1.1-3(d)(1).

## **Recommendation**

The staff recommends to the Commissioner that the proposed exemption be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application.

An application for the purposes of this review was received on October 25, 2001.

## **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) that become applicable as a result of the proposed actions.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) that become applicable as a result of the proposed actions to this source.

## **State Rule Applicability - Entire Source**

There are no new state rules that become applicable as a result of the proposed actions.

## **State Rule Applicability - Individual Facilities**

There are no new individual state rules that become applicable as a result of the proposed actions.

## **Conclusion**

This permit modification shall be subject to the conditions of the attached Exemption No. 017-15103-00042.